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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a) and 960)

JEVAUGHNY BANCY,

23-MJ-171

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MATTHEW RIZZO, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about February 22, 2023, within the Eastern District of New York and elsewhere, the defendant JEVAUGHNY BANCY did knowingly and intentionally import one or more controlled substances into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been involved in the investigation

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

of numerous cases involving drug trafficking, including cocaine investigations and drug trafficking through airports. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. On or about February 22, 2023 at approximately noon, the defendant JEVAUGHNY BANCY arrived at Terminal 4 in John F. Kennedy International Airport (“JFK”) in Queens, New York aboard Caribbean Airlines BW5 from Kingston, Jamaica.

3. During the screening process as part the defendant’s entry into the United States, officers with the United States Customs and Border Protection (“CBP”) approached the defendant in the baggage claim area and asked him where he was coming from and what his purpose was in the United States. The defendant stated that he arrived from Jamaica and was visiting his cousin for three weeks. CBP officers asked the defendant whether all of the belongings he had brought with him were his, and the defendant confirmed that they were. The defendant was asked whether anyone had asked him to carry or bring any baggage or items, to which the defendant responded no. CBP officers also confirmed with the defendant that the defendant packed his baggage himself. CBP officers also asked the defendant whether the defendant had brought any tobacco, food items, cash or alcohol into the country, and the defendant responded that he had not.

4. CBP officers then asked the defendant to search his belongings, which consisted of a black rolling suitcase that the defendant had checked. Inside the suitcase, CBP officers discovered three plastic bags of what was labeled as curry powder. In addition, the defendant’s suitcase contained a pair of Reebok sneakers and four other pairs of shoes, all of which smelled of acetone, or nail polish remover. When searching through the bag, the CBP

officers asked the defendant how long he had owned a pair of Reebok sneakers in the defendant's suitcase, and the defendant responded that he had owned those sneakers for a year. Given the smell of acetone coming from the shoes, CBP officers put the five pairs of shoes from the defendant's suitcase through an X-ray imaging machine. The X-ray revealed that the soles of the shoes did not appear to be normal rubber soles. A canine unit was then brought near the shoes, and the canine sat down, indicating that it had detected narcotics near the shoes.

5. The CBP officers then cut open one of the plastic packets marked as curry powder. After cutting open one of the plastic packets marked as curry powder, CBP officers found another smaller plastic bag contained within. The interior smaller plastic bag was filled with a powder, which field-tested positive for cocaine. The CBP officers then cut open the remaining two plastic packets marked as curry powder, both of which contained smaller plastic bags within them. A photograph of the exterior curry powder plastic bag packaging and the three plastic bags contained within, which are each covered in a yellow curry powder, is depicted below:



6. The defendant told CBP officers that he had bought the curry packets from a grocery store.

7. Subsequent to the positive field test on the substance contained in one of the plastic bags found within the packaged curry powder, CBP officers opened the soles of the five pairs of shoes found within the defendant's suitcase. CBP officers discovered a white substance contained in panels in the soles of five pairs of shoes contained in the defendant's luggage. Photographs of the shoes and the panels recovered from the soles of the shoes are shown below:



The white substance inside one of the panels field-tested positive for cocaine.

8. In total, the interior plastic bags with a powder and the panels of a white substance weighed over two kilograms.

9. Subsequently, the defendant was placed under arrest.

WHEREFORE, your deponent respectfully requests that the defendant
JEVAUGHNY BANCY be dealt with according to law.



MATTHEW RIZZO
Special Agent
United States Department of Homeland Security,
Homeland Security Investigations

Sworn to before me
on February 23, 2023



THE HONORABLE CHERYL L. POLLAK
CHIEF UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK